NICHOLAS A. TRUTANICH 1 United States Attorney District of Nevada Nevada Bar No. 13644 3 **BRIAN IRVIN** Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 (702) 388-6336 Brian.Irvin@usdoj.gov 6 7 Attorneys for the United States 8 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 9 Thanh Q. Dam and Ha Thu Ta, 10 Plaintiffs, Case No. 2:19-cv-01701-GMN-NJK 11 v. ORDER GRANTING 12 William Barr, Attorney General, STIPULATION TO EXTEND Department of Justice, Kevin Maleenan, **DEADLINES** 13 Acting Secretary for the Department of Homeland Security; Kenneth T. Cuccinelli (Third Request) II, Acting Director, Citizen and Immigration 14 Services; Al Gallmann, District Director for 15 the Phoenix Citizenship and Immigration Services; Jeanne M. Kent, Filed Office Direct, Las Vegas Citizenship and 16 Immigration Services (collectively "Federal Defendants"); 17 Defendants. 18 19 Pursuant to Local Rule IA 6-1, the parties request an extension of time to file their respective motion for summary judgment briefs. This motion is brought less than 21 days before 20 21 the parties' deadline to file respective motions for summary judgment; however, good cause exists 22 for the requested extension. 23 This is an APA action wherein Plaintiffs challenge the denial of an application of 24 citizenship. The deadline to file motions for summary judgment is September 11, 2020. Counsel 25 for Plaintiffs and counsel for Defendants have been in discussions regarding the briefing schedule 26 and potential resolution. Specifically, the parties have discussed the possibility of reopening the

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proceedings related to the revocation of the I-130 Petition (the final agency action) and the I-485, Application to Adjust Status, et. al. If the parties are able to reach an agreement, this matter will 2 be dismissed pursuant to a stipulation. Accordingly, the parties have agreed to extend the deadline to file their respective motions for summary by seven (7) days, or by September 18, 2020. If the parties reach an agreement before then, they will submit a stipulation to dismiss. 5 WHEREFORE, the parties respectfully request that this Court extend the deadline to file 6 motions for summary judgment by seven (7) days. 7 Respectfully submitted this 11th day of September 2020. 8 9 JEGLAW LTD NICHOLAS A. TRUTANICH United States Attorney 10 /s/ Jon E. Garde /s/ Brian W, Irvin BRIAN W. IRVIN JON ERIC GARDE 4455 S. Pecos Rd, Ste. B Assistant United States Attorney 12 Las Vegas, NV 89121 Attorney for Plaintiff Attorneys for the United States 13 IT IS SO ORDERED: 14 15 16 Nancy J. Koppe 17 **United States Magistrate Judge** 18 DATED: September 14, 2020 19 20 21 22 23 24 25